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VIA ELECTRONIC FILING

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Jocelyn Boyd, Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

**Re: SCTC Petition for a Determination that Wireless Carriers are Providing
Radio-Based Local Exchange Services in South Carolina that Complete with
Local Telecommunications Service Provided in the State
Docket No. 2015-290-C**

Dear Ms. Boyd:

I am writing on behalf of the South Carolina Cable Association (“SCCTA”) to respond to the motion of the CTIA-The Wireless Association (“CTIA”) that is currently pending before the Commission in the referenced docket. SCCTA urges the Commission to deny the motion filed by the CTIA and to proceed to address the issue presented in this docket – whether wireless carriers are competing with landline carriers in South Carolina and should thus be contributing to the Universal Service Fund in the same manner as landline carriers, including members of the SCCTA.

In Act 318 of 1996 the South Carolina General Assembly provided that when wireless carriers were determined to be competing with wireline carriers then the wireless carriers would be subject to supporting the USF in the same manner as wireline carriers. The SCCTA has believed for years that competition from wireless carriers was at a sufficient level to require them to support the USF. Requiring wireless carriers to do their part to support the USF will make it more equitable and competitively neutral. The SCCTA urges the Commission to move forward to consider that question on the current schedule and to neither dismiss nor delay this proceeding.

CTIA’s request to expand the scope of this proceeding would only delay a ruling on the relevant question and the SCCTA opposes that part of the motion for that reason. Moreover, the broader review of how the USF operates is more appropriately requested by contributors to the

fund. As SCCTA has advocated in the past, a regular review of the USF's operation is consistent with the public interest. Once the CTIA members are found to be competing and are required to contribute to the USF, their request for a comprehensive review would be appropriate.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

A handwritten signature in black ink, appearing to read "Frank R. Ellerbe, III". The signature is fluid and cursive, with a prominent "F" and "E".

Frank R. Ellerbe, III

FRE/tch

cc: M. John Bowen, Jr., Esquire (via email and US Mail)
Margaret M. Fox, Esquire (via email and US Mail)
Jeffrey M. Nelson, Esquire (via email and US Mail)
Andrew M. Bateman, Esquire (via email and US Mail)
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